

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAUL CONTI,

Plaintiff / Counterclaim-
Defendant

-against-

JOHN DOE,

Defendant / Counterclaim-
Plaintiff.

No. 17-CV-9268 (VEC)

**DECLARATION OF ANDREW G. CELLI, JR., IN SUPPORT OF MOTION TO
PRECLUDE REBUTTAL EXPERT TESTIMONY IN PART**

ANDREW G. CELLI, JR., an attorney duly admitted to practice before this Court and the courts of the state of New York, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner in the law firm Emery Celli Brinckerhoff & Abady LLP, attorney for Defendant/Counterclaim-Plaintiff John Doe. I respectfully submit this declaration in support of Doe's motion for an order under Federal Rule of Evidence 702 precluding Plaintiff / Counterclaim-Defendant Paul Conti from offering at trial certain anticipated rebuttal expert testimony of Dr. Donald Meyer.
2. Attached as **Exhibit A** is a true and correct copy of the rebuttal expert report of Dr. Donald Meyer.
3. Attached as **Exhibit B** is a true and correct copy of anonymized excerpts of the transcripts of the deposition of Dr. Meyer.
4. Attached as **Exhibit C** is a true and correct copy of anonymized excerpts of the transcript of the deposition of Paul Conti.

5. Attached as **Exhibit D** is a true and accurate copy of an excerpt of the transcript of the deposition of Thomas Conti.

6. Attached as **Exhibit E** is a true and correct copy of the expert report of Dr. Paul Appelbaum.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 20, 2020
New York, New York

/s/
ANDREW G. CELLI, JR.